EJP/de		
UNITED STATES DISTRICT CO	URT	
SOUTHERN DISTRICT OF NEW	YORK	
	X	NOTICE OF REMOVAL
THOMAS ISAAC,		
	Plaintiff,	
	,	Supreme Court
-against-		Rockland County
		Index No.:
PREMIER MOTOR LINES, INC. and		031653/2022
ANGEL L. ARNAU,		
		Demands Trial by Jury
	Defendants.	
	Y	

PLEASE TAKE NOTICE, that the within is a true copy of a Notice of Removal filed in the above named Court.

- This action is being removed from Supreme Court, Rockland County to the United States
 District Court for the Southern District of New York., assigned to the Federal Courthouse
 in White Plains, New York.
- 2. The basis for removal is 28 U.S.C. §1441(b).
- 3. The Court has original jurisdiction pursuant to 28 U.S.C. §1332(a) in that the plaintiff, THOMAS ISAAC, resides at 15 Cedar Avenue, Orangeburg, New York 10962 and is a citizen and resident of Rockland County, New York; and defendant, PREMIER MOTOR LINES, INC. was incorporated in the State of New Jersey, resides at 2 Colony Road, Jersey City, New Jersey 07305 and is a citizen and resident of Hudson County, New Jersey; and defendant ANGEL L. ARNAU resides at 45 Rossiter Avenue, 1st Floor, Paterson, New Jersey 07502 and is a citizen and resident of Passaic County, New Jersey and the matter in controversy exceeds the sum or value of \$75,000.00 as set forth in plaintiff's July 29, 2022 Response to Combined Demands, Resonse to Notice Pursuant to CPLR §3017(c), exclusive of interest and costs.
- 4. Defendant demands a trial by jury.

Dated: New York, New York August 9, 2022 Yours, etc.,
BY: *Ernest J. Leck*

ERNEST J. PECK DOWNING & PECK, P.C. Attorneys for Defendants 17 Battery Place - Suite 324 New York, New York 10004 212-514-9190

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